

Hon. Kenneth M. Karas

United States District Judge

Southern District of New York

Hon. Charles L. Briant Jr. Federal Building and U.S. Courthouse

300 Quarropas Street

White Plains, NY 10601

Re: United States v. Jahnine Wolinsky

Case No.: 7:25-cr-00071-KMK

Updated Request for Temporary Removal of Ankle Monitor – April 24, 2025

Dear Judge Karas:

I respectfully submit this letter on behalf of my client, Jahnine Wolinsky, to request a temporary modification of her bail conditions to allow for the removal and same-day reinstallation of her ankle monitor on **April 24, 2025**, in order to undergo a medically necessary MRI with IV contrast.

Although Your Honor previously granted this request, Ms. Wolinsky was unfortunately not informed until after her last scheduled appointment that the Court had approved her for the MRI and monitor removal. As a result, she did not attend the appointment and the monitor was not removed.

She has since rescheduled her appointment for **tomorrow morning, April 24, 2025, at 8:30 AM**. We respectfully renew our request that the ankle monitor be temporarily removed and reinstalled the same day, solely to facilitate this diagnostic scan.

As previously noted, Pretrial Services does not object and is prepared to coordinate the removal and reinstallation. The Government also does not object to this medical accommodation.

We thank the Court for its understanding and consideration of this updated request. Please let me know if any additional documentation is required.

Respectfully submitted,

Samantha Chorny

Samantha Chorny, Esq.

Attorney for Defendant

SMC Law Firm

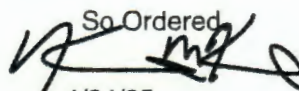
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Granted.

So Ordered

4/24/25